

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CYNTHIA RUSSO, LISA BULLARD,  
RICARDO GONZALES, INTERNATIONAL  
BROTHERHOOD OF ELECTRICAL  
WORKERS LOCAL 38 HEALTH AND  
WELFARE FUND, INTERNATIONAL  
UNION OF OPERATING ENGINEERS  
LOCAL 295-295C WELFARE FUND, AND  
STEAMFITTERS FUND LOCAL 439, on  
Behalf of Themselves and All Others Similarly  
Situated,

Plaintiffs,

v.

WALGREEN CO.,

Defendant.

Civil No. 17-cv-2246

Judge Edmond E. Chang

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF PROPOSED SETTLEMENT**

Plaintiffs Cynthia Russo, Lisa Bullard, Richard Gonzales (the “Individual Plaintiffs”), International Brotherhood of Electrical Workers Local 38 Health and Welfare Fund, International Union of Operating Engineers Local 295-295c Welfare Fund, and Steamfitters Fund Local 439 (the “Fund Plaintiffs,” and with the Individual Plaintiffs, “Plaintiffs”), by and through their undersigned counsel, respectfully move this Court, pursuant to Rule 23(e)(1) of the Federal Rules of Civil Procedure, for entry of an Order: (1) granting final approval of the Settlement; (2) finally certifying the Settlement Class; (3) finding the Settlement and Plan of Allocation to be fair, reasonable, and adequate ; (4) overruling objections; and (5) appointing Class Counsel and Class Representatives for the Settlement Class.<sup>1</sup>

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<sup>1</sup> Unless otherwise defined herein, capitalized terms have the same meaning as in the October 31, 2024 Stipulation of Class Action Settlement. ECF No. 683-1.

This motion is based upon the accompanying Memorandum of Law, the Declaration of Joseph P. Guglielmo in Support of Final Approval of Proposed Settlement, the Declaration of Eric J. Miller of A.B. Data, Ltd. Regarding Notification of Settlement, Opt-Outs Received, and Claims Received from Settlement Class Members, and all other papers and proceedings herein. The proposed Judgment will be emailed to the Court pursuant to the Court's Case Procedures.

Pursuant to the terms of the Stipulation, this motion is unopposed by Defendant.

DATED: August 6, 2025

Respectfully submitted,  
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*Proposed Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed electronically through the Court's Electronic Case Filing System, which will then send a notification of such filing to the registered participants as identified on the Notice of Electronic Filing.

/s/ Joseph P. Guglielmo  
Joseph P. Guglielmo